

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 20-10768-amc
Kevin M Wallace, Sr.	: Chapter 13
Debtor	:
	:
Bridgecrest Credit Company, LLC	:
Movant	:
	:
vs.	:
	:
Kevin M Wallace, Sr.	:
Debtor/Respondent	:
and	:
William C. Miller, Esquire	:
Trustee/Respondent	:

**OBJECTION TO CONFIRMATION OF THE PLAN**

Bridgecrest Credit Company, LLC (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtor, Kevin M Wallace, Sr. (“Debtor”), as follows:

1. As of the bankruptcy filing date of February 06, 2020, Movant holds a secured Claim against the Debtor’s Vehicle, a 2009 Cadillac CTS AWD, VIN # 1G6DS57V590130222 (the “Vehicle”).
2. On February 17, 2020, Movant filed a Proof of Claim with a total secured claim in the amount of \$18,369.12, with an interest rate of 26.014%.
3. The Plan only proposes to pay a total claim of \$8,362.00, with an interest rate of 4.00%.
4. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim, as the debt was incurred on July 13, 2018, which is within 910 days of the filing of the instant bankruptcy.
5. Any attempt by the Debtor to modify any portion of this Contract with Movant should be denied.

6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Respectfully submitted,

Dated: 04/10/2020

/s/ Stephen M. Hladik, Esquire  
Stephen M. Hladik, Esquire  
Hladik, Onorato & Federman, LLP  
Attorney I.D. # 66287  
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North Wales, PA 19454  
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Kevin M Wallace, Sr.	:	
Debtor/Respondent	:	
and	:	
William C. Miller, Esquire	:	
Trustee/Respondent	:	

**CERTIFICATE OF MAILING OF OBJECTION TO THE PROPOSED  
PLAN TO PARTIES IN INTEREST**

I, Stephen M. Hladik, Esquire, attorney for Bridgecrest Credit Company, LLC (“Movant”), certify that I served a copy of the attached Objection to the Plan to the parties below on 04/10/2020:

John L. McClain, Esquire  
Via Electronic Filing  
*Attorney for Debtors*

William C. Miller, Esquire  
Via Electronic Filing  
*Trustee*

Kevin M Wallace, Sr.  
1157 Atwood Road  
Philadelphia, PA 19151  
Via First Class Mail  
*Debtors*

/s/ Stephen M. Hladik, Esquire  
Stephen M. Hladik, Esquire  
Hladik, Onorato & Federman, LLP  
Attorney I.D. # 66287  
298 Wissahickon Avenue  
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